

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

ILA LAFRENTZ, JIM )  
LAFRENTZ, KATHERINE )  
PORTERFIELD, and )  
WILLIAM LAFRENTZ, )  
Individually and as )  
Representative of the )  
Estate of JAMES B. )  
LAFRENTZ, )  
 )  
Plaintiffs, )  
 ) CIVIL ACTION  
VS. ) NO. 4:18-cv-04229  
 )  
3M COMPANY, and GENERAL )  
DYNAMICS CORPORATION, )  
 )  
Defendants )

REMOTE ORAL AND VIDEOTAPED DEPOSITION OF  
ERIK WILLIAM JOHNSON  
DECEMBER 15, 2020  
VOLUME 1 OF 1

REMOTE ORAL AND VIDEOTAPED DEPOSITION  
OF ERIK WILLIAM JOHNSON, produced as a witness at  
the instance of the Defendants and duly sworn,  
was taken in the above styled and numbered cause  
on Tuesday, December 15, 2020, from 10:00 a.m.  
CST to 1:34 p.m. CST, before Nicola Gengler, CSR,  
RPR, in and for the State of Texas, reported by  
computerized stenotype machine, pursuant to the  
Texas Rules of Civil Procedure and the provisions  
stated on the record herein.

1 around 2006.

2 Q. Your work in India?

3 A. India and Singapore. We did a series  
4 of training in a whole progression of countries.

5 Q. Okay. And what happened after 2010?  
6 I mean, why did you not work with the product  
7 after that time?

8 A. Okay. So by 2010 it had already been  
9 discontinued in the U.S. and my role was shifted  
10 away from the Asia-Pacific responsibility, so I  
11 was asked to focus on other things at that time.

12 Q. Okay. The product that you worked  
13 with in Mexico and in Asia which we refer to the  
14 8710, did it have that designation there or were  
15 there other product designations?

16 A. There were and are still variations  
17 of the 8710. Sorry. It's been many years. I  
18 can't recall whether it was the 8710 that was  
19 used in the U.S. or if it was a slightly  
20 different product.

21 Q. I didn't understand that.

22 A. So if I understood your question  
23 correctly, you were asking was it the 8710 that  
24 was being used exactly in those countries and my  
25 response was there have been a couple different

1 variations of the 8710, but I'm not as familiar  
2 with the ones that were marketed to other  
3 countries. I just don't recall the similarities  
4 or differences.

5 Q. Okay. Do you recall if they used the  
6 same nomenclature; that is, did they call it 8710  
7 or are there different numerical or name  
8 designations overseas?

9 A. I believe --

10 DEFENSE COUNSEL: Objection, form.

11 THE WITNESS: -- at least the  
12 packaging would have been changed because it's no  
13 longer NIOSH approved.

14 In some places, it may have been  
15 called like an 8710I for India or something like,  
16 you know, a different letter or tag onto the end  
17 of the number to indicate that this is for India,  
18 this is for China, this is for wherever.

19 BY MR. HART:

20 Q. Okay. Are you familiar with a  
21 designation called 8710H?

22 A. That I have seen in the development  
23 of the product in the documents. I don't recall  
24 all of that specifically as I sit here today.  
25 But, yes, I have read that in the past, but that

1 one of those journals, yes.

2 BY MR. HART:

3 Q. Has the Journal of the American  
4 Industrial Hygiene Association been available at  
5 3M since the 1950s?

6 A. I don't know when we started having  
7 that but, yes, it is available today and as far  
8 as I can remember since I started working in the  
9 mid '90s.

10 Q. All right. And there is a library at  
11 3M that contains such journals, is that correct,  
12 perhaps more than one?

13 A. Yeah. It used to be a physical  
14 library. It may be more online today. I don't  
15 know.

16 Q. Okay. Do you know that from your  
17 review of the historical documents on the 8710  
18 and its predecessor mask, the 8500, that 3M  
19 worked with Dr. Selikoff at different points in  
20 time; is that correct?

21 A. Yes.

22 Q. Okay. And in the 1960s, 3M was  
23 working with Dr. Selikoff in its efforts to  
24 develop a mask that became the 8710; is that  
25 correct?